

Dear Ms. Saare-Edmonds:

Olivenhain Municipal Water District is a public agency providing water, wastewater services, recycled water, hydroelectricity, and the operation of the Elfin Forest Recreational Reserve. We supply potable water to approximately 83,000 people through over 27,000 connections in our 48 square mile service area. We thank you for the opportunity to comment on the proposed update to the State's Model Water Efficient Landscape Ordinance (MWEL0).

San Diego water agencies have been working towards a more holistic approach to water and watershed management, reducing the amount of turf used in landscaping and reducing the water budgets for new development. I am writing in support the comments of the San Diego County Water Authority and other San water agencies in my region, and would like to emphasize the following:

- Section 490.1: Requiring soil management report, grading design plan, irrigation audit and landscape design plan bearing the signature of a licensed landscape architect will be excessive and impractical for a single-family home or small commercial project. The financial burden, availability of licensed landscape architects and the documentation process through municipal and county land planning departments will make this a cumbersome, expensive and lengthy process. The ordinance should allow for small scale projects to waive these requirements and require them, instead, just to meet the site's water budget requirements.
  - Section 496.2 (b) (14) "...bear the signature of a licensed landscape architect, licensed landscape contractor, landscape designer or any other person authorized to design a landscape." potential issue of not having enough authorized professionals available. There are also many workshops, some water agency sponsored, that offer training in self-designed landscapes that may surpass the understanding of trained professionals, who may or may not have training in water conserving methodology. I recommend that the ordinance allow for design criteria that the property owners can address without the expense of a designer, or contractor who may or may not have an understanding of water conserving landscape principles.
  - 492.7 (a) (1) (M) "The irrigation system must be designed and installed in such a manner that a precipitation rate of 1.0 inches per hour is not exceeded in any portion of the landscape."  
I concur with manufacturer, Rainbird, in that "by limiting precipitation rates, some of the most efficient products available will be eliminated from use, including many rotor models used in schools, parks and sports fields, the industry's most efficient spray models and even some drip applications."
- \* Section 492.13. Irrigation Efficiency  
(a) "For the purpose of determining Maximum Applied Water Allowance, average irrigation efficiency is assumed to be 0.8571 for residential areas and 0.92 for non-residential areas. Irrigation systems shall be designed, maintained, and managed to meet or exceed a site-widen average landscape irrigation efficiency of 0.8571 for residential areas and 0.92 for non-residential areas."  
Again, I concur with Rainbird's comments, "We all strive to use the most efficient technologies on the market. Unfortunately, because Irrigation Efficiency is based on Distribution Uniformity, there may be no combination of irrigation products available on the market today that will achieve the requirements

proposed in the draft ordinance. This also results in ET Adjustment Factors that are likely to be unattainable.”

\* 492.17 (a) “local agency or water supplier/purveyor shall provide information to owners of permitted renovations and new single-family residential homes regarding the design, installation, management, and maintenance of water efficient landscapes based on a water budget.”

Will the state be funding this mandate or providing actual guidelines?

\* Large and small landscape owners have invested significantly in good quality efficient irrigation equipment that would be outdated by this ordinance. Many are in the process of replacing equipment in phases, using existing incentive programs. Being consistent helps to ensure replacement equipment will keep stations on the same precipitation rate. I recommend that the ordinance allow for existing efficient irrigation technologies to continue to be used, updated and installed.

- Even drip irrigation systems have leaks. At least with larger service lines, flow sensors can capture the leaks. Allow property owners to choose best way to comply. Drip is not the best answer in all situations.

There are some very good measures for improving water use efficiency, and with further discussion with water industry experts, equipment manufacturers, as well landscape professionals, we will avoid unrealistic expectations for the public, in the commercial sector and in city planning and code enforcement.

Thank you for allowing a comment period on these proposed changes to the MWELO.

Sincerely,

Teresa

Teresa Chase  
Olivenhain M.W.D.